

The applicants' representative also notes that the priority claim with respect to the inventorship of the present application is still being investigated to ensure that the proper priority has been claimed with respect to Provisional application 60/060,655 and as to whether a correction of inventorship is required.

Claims 1, 3-5, 7-15, 56-60 and 96 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Scholl et al. (U.S. Patent 6,145,001; hereinafter Scholl) in view of Takahashi et al. (U.S. Patent 4,823,373; hereinafter Takahashi). The rejection is respectfully traversed.

Claim 1 recites at least one dispatch server for communicating with the secure web server and a plurality of system resources. Claim 1 also recites that the plurality of system resources includes a network manager which manages the routing of the customer's traffic over the communications network and a view application to review the network traffic. Claim 1 further recites that the network manager and view application are responsive to proxy requests from the dispatch server to enable the customer to command and control switched voice traffic resources and switched data traffic resources provided by the enterprise to the customer. Neither Scholl nor Takahashi discloses or suggests these features, as discussed in detail below.

For example, as to claim 1, the Office Action states that Scholl discloses a system that includes at least one web server, at least one dispatch server, a plurality of system resources and a network manager (Fig. 3, devices 3, 5, 6 and 9, respectively). The Office Action admits that Scholl does not disclose "switched communications including switched voice traffic resources and switched data traffic resources (Office Action – page 3). The Office Action, however, states that Takahashi discloses the use of switched voice traffic resources and switched data traffic resources including switched toll free voice traffic resources for a new network management

system” and points to the Abstract and Summary of the Invention of Takahashi for support (Office Action – page 3).

First, even if Takahashi does disclose the use of switched communications that include voice and data traffic resources, this is not what is recited in claim 1. Claim 1 recites that the network manager and the view application are responsive to proxy requests from the dispatch server to enable the customer to command and control switched voice traffic resources and switched data traffic resources provided by the enterprise to the customer. The mere fact that Takahashi discloses the use of switched voice and data traffic resources does not read on the claimed features.

More particularly, the Abstract of Takahashi discloses a line switching control system that switches between a data communication mode and a voice communication mode in a mobile communication system. This portion of Takahashi does not disclose receiving requests from a dispatch server to enable the customer to command and control switched voice traffic resources or switched data traffic resources, as recited in claim 1.

The Summary of the Invention of Takahashi discloses a line switching control system that allows a user to switch between a data communication mode and a voice communication mode by pressing a function key of a handset (Takahashi – col. 1, line 65 to col. 2, line 25). This portion of Takahashi does not disclose a network manager which manages the customer’s traffic and a view application to review the network traffic, much less a network manager and view application which are responsive to proxy requests from a dispatch server to enable the customer to command and control switched voice traffic resources and switched data traffic resources provided by the enterprise to the customer. This portion of Takahashi merely discloses that in a mobile communication system, a user can press a key on his/her handset to switch between a

data communication mode and a voice communication mode. This is not equivalent to the features recited in claim 1.

Therefore, the combination of Scholl and Takahashi does not disclose or suggest each of the features of claim 1. Accordingly, withdrawal of the rejection and allowance of claim 1 are respectfully requested.

Claims 3-5 and 7-15 depend from claim 1 and are believed to be allowable over the combination of Scholl and Takahashi for at least the reasons claim 1 is allowable. In addition, these claims include additional features not disclosed or suggested by the prior art of record.

For example, claim 3 recites that the switched voice traffic resources include switched toll free voice traffic resources and the network manager includes a toll free network manager application to command and control the routing of switched toll free voice traffic. The Office Action states that Takahashi discloses the use of switched toll free traffic resources and points to the Abstract and Summary of the Invention of Takahashi for support (Office Action – page 3). The applicants respectfully disagree.

Neither the Abstract nor the Summary of the Invention of Takahashi even mentions toll free voice traffic. These portions of Takahashi refer to a mobile communication system that enables a user to switch between a data communication mode and a voice communication mode. A conventional mobile voice communication mode is not equivalent to a toll free communication mode. Therefore, the mere fact that Takahashi discloses a mobile voice communication mode does not read on or suggest receiving proxy requests from a dispatch server to enable the customer to command and control switched toll free voice traffic, as recited in claim 3.

Claim 4 recites that the switched voice traffic resources include switched call center voice traffic resources and the network manager includes a call manager application to command

and control the routing of switched voice traffic between call centers. The Office Action has not particularly addressed these features. The applicants respectfully request that any subsequent Office Action specifically point out where these features are allegedly disclosed in the prior art of record or withdraw the rejections. In any event, neither Scholl nor Takahashi discloses or suggests these features.

For at least these additional reasons, withdrawal of the rejection and allowance of claims 3 and 4 are respectfully requested.

Claim 12 recites that the reporter includes a priced call application for enabling a customer to generate priced reports and invoices for a plurality of switched voice communication applications. The Office Action has also not particularly addressed this feature and the applicants respectfully request that any subsequent Office Action point out where this feature is allegedly disclosed in the prior art of record. In any event, neither Scholl nor Takahashi discloses or suggests this feature. For at least this additional reason, withdrawal of the rejection and allowance of claim 12 are respectfully requested.

Claim 56 recites a plurality of system resources that includes a toll free network manager which manages the routing of the customer's toll free voice traffic and a real time monitor which provides near real time monitoring of network traffic. Claim 56 also recites that the network manager and real time monitor are responsive to proxy requests from the dispatch server to enable the customer to manage the communications network resources provided by the enterprise to the customer in near real time.

Similar to the discussion above with respect to claims 1 and 3, neither Scholl nor Takahashi discloses a toll free network manager which manages the routing of the customer's toll free traffic. In addition, neither Scholl nor Takahashi discloses or suggests a real time

monitor which provides near real time monitoring of network traffic, as recited in claim 56.

Further, neither Scholl nor Takahashi discloses enabling the customer to manage communications network resources provided by the enterprise to the customer in near real time, as recited in claim 56. For at least these reasons, withdrawal of the rejection and allowance of claim 56 are respectfully requested.

Claims 57-60 depend from claim 56 and are believed to be allowable for at least the reasons claim 56 is allowable. In addition, these claims include additional features not disclosed or suggested by the prior art of record.

For example, claim 57 recites that the system includes a single order entry application that enables a customer to identify and authenticate a plurality of users with distinct toll free call manager entitlements and to modify the entitlements. Claim 58 recites that the system includes an E-billing application that enables the customer to manage and pay for services provided by the enterprise. Claim 60 recites that the system enables invoice generation and electronic payment for pre-selected customer user calls over the public Internet.

The Office Action has not particularly addressed any of these features. The applicants respectfully request that any subsequent Office Action particularly point out where Scholl or Takahashi allegedly discloses these features or withdraw the rejections. In any event, neither Scholl nor Takahashi discloses or suggests any of these features. For at least these additional reasons, withdrawal of the rejection and allowance of claims 57, 58 and 60 are respectfully requested.


Claim 96 recites similar features as claim 1 in method claim form. For reasons similar to those discussed above with respect to claim 1, withdrawal of the rejection and allowance of claim 96 are respectfully requested.

CONCLUSION

In view of the foregoing remarks, applicants respectfully request withdrawal of the outstanding rejections and the timely allowance of this application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 13-2491 and please credit any excess fees to such deposit account.

Respectfully submitted,
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